

- UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

8. Raise your hand if you or any of your family members or close friends has worked for the federal, state or local government. Please describe.
9. Raise your hand if you or any of your family members or close friends has ever worked in law enforcement or in a compliance capacity. Please describe.
10. Raise your hand if you are not really satisfied with your current job.
11. Raise your hand if you or any of your family members or close friends has ever worked for any of the following companies. If so, please describe the nature of that work, and your opinion of the company.
 - a. Bertelsmann, A.G.
 - b. Hewlett-Packard
 - c. Sun Microsystems
 - d. Telefonica
 - e. Ticketmaster
 - f. Veritas
 - g. Wembley
 - h. WorldCom
 - i. AOL
 - j. Time Warner
 - k. AOL Time Warner
12. Raise your hand if you have ever heard of any of the companies I just mentioned. If so, what is your opinion of them?
13. Raise your hand if you have an unfavorable opinion of America Online, Time Warner or AOL Time Warner, perhaps because of a bad experience or dispute you had or because of something you read or heard about those companies.
14. Raise your hand if you or any of your family members or close friends has invested in the stock of America Online, Time Warner or AOL Time Warner and been dissatisfied with the way that stock performed.
15. Raise your hand if business or investing does not really interest you.
16. Raise your hand if you are opposed to working for a large corporation.
17. Raise your hand if you would say that you generally distrust corporations.
18. Raise your hand if you believe that most big corporations are unethical.
19. Raise your hand if your opinion of corporate executives has become much more negative in recent years.
20. Raise your hand if you believe the way senior executives at corporations are paid promotes corruption.

21. Raise your hand if you believe the recent economic downturn was caused mostly by corporate or executive greed.
22. Raise your hand if you believe that corporate executives often intentionally misrepresent their company's performance by inflating corporate financials.
23. Raise your hand if you believe that, if a company restates its financials by many millions of dollars, it means that there was some type of fraud.
24. Raise your hand if you believe that penalties for corporations and executives who misbehave are not serious enough.
25. Raise your hand if you believe that large accounting firms cannot be trusted to provide thorough and honest audits of their corporate clients.
26. Raise your hand if you or any of your relatives or close friends has ever been the victim of an investment fraud. If yes, what was the nature of the matter and the outcome?
27. Raise your hand if you or any of your family members or close friends has been negatively affected by any type of corporate misconduct.
28. Raise your hand if you or any of your family members or close friends suffered any losses after the so-called "tech stock bubble" in the early 2000's. If so, describe this in general terms.
29. Raise your hand if you or any of your family members or close friends suffered any hardship as a result of the recent financial crisis that began around 2008 and continues up to the present. If so, describe this in general terms.
30. Raise your hand if you have read any books or articles or have watched any television shows, documentaries or movies about any corporate accounting scandals or allegations of wrongdoing by corporate executives. If so, what did you read or watch and what opinions did you form based on what you read or saw?
31. Raise your hand if you have written to any elected or appointed government official; or to any newspaper or magazine; or called in to any television or radio program; or written to any internet "chat room"; or blogged to express your opinion about corporate accounting scandals or allegations of wrongdoing by corporate executives or any other related issue. Please describe.
32. Raise your hand if you have ever heard of Scott Sullivan. If so, what do you know about him?
33. Raise your hand if you have seen "Wall Street" or other movies or television shows about the work of the SEC, or read books or articles about the agency. If

so, describe in general and indicate how such shows or publications have influenced your view of the SEC.

34. Raise your hand if you believe that when the SEC files a lawsuit, the claims probably have some merit.
35. Raise your hand if you feel that you might have a difficult time rendering a verdict against the SEC in a case in which the SEC has sued a large corporation even if the evidence supports such a decision.
36. Raise your hand if you would give greater weight to testimony from a witness who was called to testify by the SEC.
37. Raise your hand if you or any of your relatives or close friends has ever been involved as a witness or in any other way in a matter involving the SEC or another financial or securities regulatory organization. If so, describe.
38. Raise your hand if you or any of your relatives or close friends has ever referred a complaint or other matter to the SEC or another securities regulatory organization for investigation. If yes, what in general terms was the nature of the referral and the outcome?
39. Raise your hand if you believe that it is a good use of the Government's resources to sue individual corporate executives.
40. Raise your hand if you think the Government needs to be more involved in regulating our economy and our financial markets.
41. Raise your hand if you think the Government should raise taxes on wealthy individuals.
42. Raise your hand if you or any of your relatives or close friends has ever been a plaintiff or complaining party in any trial, hearing, arbitration or other form of litigation. If yes, what was the nature of the matter and the outcome? Were you/they satisfied with that outcome?
43. Raise your hand if you have ever been a witness in a lawsuit. If so, what type of case was it, what was the nature of your testimony, and how long ago did it take place?
44. Raise your hand if you or any of your relatives or close friends has ever been a witness in or the subject of a criminal or other government investigation, state or federal. Please describe.
45. Raise your hand if you have ever served as a juror or grand juror. Was it a civil or criminal case? What type of case was it? Without telling us the outcome, did the jury reach a verdict? Were you the foreperson?

46. Raise your hand if you believe a defendant who is a lawyer or had legal training should be held to a different legal or ethical standard than any other defendant. Please explain.
47. Raise your hand if you believe a defendant or witness who has invoked the Fifth Amendment to the Constitution should be held to a different standard than a defendant or witness who has not. Please explain.
48. Raise your hand if you believe that people assert their right not to incriminate themselves under the Fifth Amendment to the Constitution only when they are guilty of a crime.
49. Raise your hand if you believe that, in a situation where a group makes a decision, all members of the group should be considered equally responsible for the outcome of the decision. Or does the role of the individuals within the group matter? Please explain.
50. Raise your hand if you have heard or read anything about this case or the underlying facts. Please describe what you have heard or read.
51. Raise your hand if, based on what you have heard or read, you have formed any opinions. Please describe your opinions.
52. Raise your hand if you have heard or read or seen anything concerning any other case that appears to you to be like this case. Please describe.
53. Raise your hand if you have read or heard about any specific statements attributed to the defendants in this case. Please describe.
54. Raise your hand if you have read or heard about any specific statements by any U.S. government officials concerning this case. Please describe.
55. Raise your hand if you have an issue with your hearing or vision or any other medical issue that might prevent you from giving your full attention to all of the evidence at this trial.
56. Raise your hand if you have any difficulty reading or understanding English to any degree.
57. Raise your hand if you have even the slightest doubt in your mind about whether you can be completely fair and impartial in this case.

**Requested Instructions to Be Given Immediately
Following the Empanelment of the Jury**

1. From this point until you retire to deliberate on your verdict, it is your duty not to discuss this case and not to remain in the presence of other persons who may be discussing this case. This rule about not discussing the case with others includes discussions even with members of your own family or friends.
2. If at any time during the course of this trial, any person attempts to talk to you or to communicate with you about this case, either in or out of the courthouse, you should immediately report such attempt to me.
3. In this regard, let me explain to you that the attorneys and the defendants in a case are not supposed to talk to jurors, even to offer a friendly greeting. So if you happen to see any of them outside this courtroom they will, and should, ignore you. Please do not take offense. They will only be acting properly by doing so.
4. Finally, during the time this trial is pending, members of the jury, you are not to read, listen to, watch, discuss, blog, tweet or post any stories about this case or the persons involved in this trial or undertake any research regarding the persons or issues in this case.

Dated: August 15, 2011

Respectfully submitted,

/s/ Roger E. Warin (by consent)

Roger E. Warin (*pro hac vice*)
Reid Weingarten (*pro hac vice*)
Patrick F. Linehan (PL-9708) (*pro hac vice*)
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
Tel: (202) 429-6477
Fax: (202) 429-3902
rwarin@steptoe.com

Counsel for Defendant Steven E. Rindner

/s/ Stephen G. Topetzes

Stephen G. Topetzes (ST-4145) (*pro hac vice*)
Glenn R. Reichardt (GR-2394) (*pro hac vice*)
Erin Ardale Koeppel (EK-3460) (*pro hac vice*)
Stephen J. Crimmins (SC-2714) (*pro hac vice*)
Theodore L. Kornobis (TK-7046) (*pro hac vice*)
K&L GATES LLP
1601 K Street NW
Washington, DC 20006
Tel: (202) 778-9000
Fax: (202) 778-9100
stephen.topetzes@klgates.com

Counsel for Defendant Mark Wovsaniker

CERTIFICATE OF SERVICE

I hereby certify that on 15th day of August, 2011, I served a true and correct copy of the foregoing **DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS** through the Court's electronic case filing system and on counsel of record via the agreed-upon method of electronic mail.

s/ Stephen G. Topetzes
Stephen G. Topetzes (ST-4145)